

The Honorable Robert S. Lasnik

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SAGE ALIXANDER, an individual,

Plaintiff,

v.

KAISER FOUNDATION HEALTH PLAN
OF WASHINGTON, UBI No. 578011461, a
Washington Corporation,

Defendant.

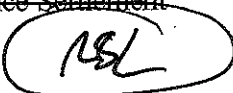
No. 2:17-cv-01224-RSL

STIPULATED MOTION TO SEAL
EXHIBIT C TO THE DECLARATION
OF JENNY WETZEL IN SUPPORT OF
MOTION TO DISMISS OR COMPEL

**Noted for Hearing:
February 8, 2018**

I. STIPULATED MOTION

Pursuant to Local Rule 5(g), Plaintiff Sage Alixander and Defendant Kaiser Foundation Health Plan of Washington ("Kaiser") hereby jointly request the Court to enter an order sealing Exhibit C to the Declaration of Jenny Wetzel in Support of Motion Dismiss or Compel Arbitration ("Wetzel Declaration"). Exhibit C is a confidential Grievance Settlement Agreement entered into between the Parties and OPEIU Local 8 in October 2016. The Grievance Settlement Agreement contains a clause requiring confidentiality of the settlement

1 terms. Counsel also request the Court enter an order sealing any portions of pleadings or
2 declarations containing references to confidential terms in the Grievance Settlement
3 Agreement, to the extent any such references are made. 

4 Counsel for the Parties conferred on February 7, 2018 and agree that the Grievance
5 Settlement Agreement should be filed under seal because the Parties and OPEIU Local 8
6 agreed to a confidentiality provision in the Grievance Settlement Agreement. Counsel for the
7 Parties conferred regarding alternatives to filing under seal in order to minimize the amount of
8 material filed under seal, and agree that the provisions in Grievance Settlement Agreement at
9 issue in Defendant's Motion to Dismiss or Compel Arbitration can be referenced in the filings
10 without redaction. This includes the: (1) general recitals, (2) arbitration provision
11 (Paragraph 8), (3) any release terms, (4) opening section defining terms, (5) Paragraph 9, and
12 (6) Paragraph 1 and referenced grievances. Counsel also agree that any references to the other
13 settlement terms in the Grievance Settlement Agreement in the pleadings or related declarations
14 should be redacted as appropriate to minimize the amount of material filed under seal. This
15 agreement extends to any responsive pleadings or declarations filed or submitted.
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18 DATED this 8th day of February, 2018.

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20 Davis Wright Tremaine LLP
Attorneys for Defendant

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STIPULATED MOTION TO SEAL – 3
(CASE NO. 17-CV-1224 RSL)
4838-5297-2119v.2.0009887-000073

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II. ORDER

Pursuant to the Parties' foregoing Stipulated Motion to Seal, IT IS SO ORDERED.

Signed this 12th day of February, 2018.



The Honorable Robert S. Lasnik